



# San Diego County Sheriff's Department

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*Anthony C. Ray, Sheriff*

*Kelly A. Martinez*  
*Undersheriff*

December 28, 2022

Eileen Delaney, Board Chairperson  
Citizens' Law Enforcement Review Board  
555 West Beech Street, Suite 505  
San Diego, CA 92101-3819

**CLERB CASE NUMBER: #21-083**

Dear Chairperson Delaney,

The Sheriff's Department welcomes and supports the Citizens' Law Enforcement Review Board's (CLERB) independent review of complaints alleging improper actions by members of this organization and in-custody deaths. We continuously strive to respond with professionalism and concern to the citizens we serve, and the CLERB process provides invaluable input.

On October 2, 2022, CLERB recommended the below policy be added to the Detention Services Bureau (DSB) Policies and Procedures, where applicable.

1. It is recommended that deputies be required to notate in the Jail Information Management System (JIMS) each meal distribution in each housing unit, in conformance with California Title 15 Minimum Standards for Local Detention Facilities. If an incarcerated person misses a regularly scheduled meal and is provided with a substitute meal and beverage, it will be noted in JIMS.
2. It is recommended that the completion or incompleteness (and reason for an incompleteness) of all California Title 15 Minimum Standards for Local Detention Facilities requirements shall be noted in JIMS (showers, mail, etc.).

The San Diego Sheriff's Department appreciates all recommendations made by the Citizen's Law Enforcement Review Board. Complying with all Title 15 mandates for the incarcerated population is of the utmost importance to the department.

CLERB recommendation one suggests a Title 15 requirement for logging meal distribution and alternative meals provided if an incarcerated person misses a meal service. DSB P&P Section K.15 – Serving Times and Meal Distribution does not explicitly dictate what information must be documented in JIMS concerning meals. Each facility's green sheet identifies each meal type and serving times. Although there is a Title 15 requirement to provide meals with specified dietary needs, there is no requirement to log each meal distribution in each housing unit or to document alternative meals supplied to individuals who miss a meal service.

Our current practice of logging meal services within each housing area exceeds the Title 15 requirement. With an average daily population of approximately 4,000 incarcerated persons, it is impractical to verify if each person consumed their meal. JIMS log entries for most area activities are for the entire housing unit, not

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each individual. Although Title 15 requirements, such as meals and showers, are facilitated by staff, it is incumbent upon the incarcerated person to assume the responsibility of eating, showering, etc. If staff becomes aware an incarcerated person cannot participate during mealtimes for any reason, personnel assigned to each housing unit are responsible for ensuring the individual has an opportunity to eat. Deputies will save meals for individuals who miss regular mealtimes due to court visitations, medical appointments, professional visits, etc.

Recently implemented procedures require staff to conduct wellness checks on the most vulnerable individuals in our custody. These wellness checks ensure subjects are eating properly and following proper hygiene and cleanliness standards, as well as providing opportunities to assess those individuals' medical and mental well-being. This more comprehensive approach ensures proper nutrition for our incarcerated population, which we believe will provide greater health assurance than CLERB's recommendation.

CLERB recommendation two suggests the completion or incompleteness (and reason for an incompleteness) of all California Title 15 Minimum Standards for Local Detention Facilities requirements shall be noted in JIMS (showers, mail, etc.). There is also no requirement under Title 15, which mandates the documentation of these activities. However, this recommendation is already a current operational practice for the San Diego Sheriff's Department.

If a Title 15 requirement was not fulfilled, a log entry is to be made in the associated Area Activity Log. If the impact is to an incarcerated person, a status report is written, documenting the incident and resolution. These reports are reviewed by a supervisor and included in JIMS. Under Detention P&P Section I.21, supervisors review JIMS Area Activity Logs at least twice during their shift to ensure compliance with the minimum standards required under Title 15. Each supervisor will make a "Supervisor Log Review" entry explaining any discrepancy discovered. Additionally, the shift Watch Commander is required to conduct a review at least once per shift.

The Board of State and Community Corrections (BSCC) conducts biennial inspections of our facilities to determine compliance with Title 15 standards. Part of this inspection includes reviewing our policies and procedures and comparing the contents against relevant regulations contained in Title 15 to ensure each minimum standard required by statute is addressed in policy. The final report for the 2020-2022 inspection did not indicate any non-compliance issues related to the Title 15 minimum standards concerning the recommended policy revisions.

In closing, we appreciate the time and effort of the Citizen's Law Enforcement Review Board. Thank you for your service to the Citizens of San Diego County and the policy recommendations. Our goal is to provide the "Highest quality public safety services" to everyone in San Diego County.

Sincerely,

ANTHONY C. RAY, SHERIFF



Edward A. Greenawald, Lieutenant  
Office of the Sheriff  
Division of Inspectional Services  
ACR:EAG:mt